




United States District Court	DISTRICT of ARIZONA
<b>United States of America</b> <b>v.</b> <b>Ramon ARELLANO-Ramos</b> DOB: xx/xx/1987 Mexican Citizen <b>Ada Selene CERECER-Castro</b> DOB: xx/xx/1984 Mexican Citizen	DOCKET NO.  MAGISTRATE'S CASE NO. <b>19-06033 MJ</b>
Complaint for violation of Title 18 United States Code § 554(a)	
<b>COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:</b>  On or about April 28, 2019, at or near Nogales and elsewhere within the District of Arizona, Ramon ARELLANO-Ramos and Ada Selene CERECER-Castro knowingly exported and sent from the United States, and attempted to export and send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, to wit: five AR-style upper receivers, five AR-style lower receivers, five AR-style barrels, five AR-style buffer tubes, five trigger component kits, five AR-style pistol grips, and one Beretta 9mm pistol; knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 22, United States Code, Section 2778; Title 22, Code of Federal Regulations, Part 121.1; and Title 22, Code of Federal Regulations, Part 123.1; in violation of Title 18, United States Code, Section 554(a).	
<b>BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:</b>  On April 28, 2019, Customs and Border Protection Officers conducting outbound vehicle inspections at the DeConcini Port of Entry in Nogales, Arizona, encountered a vehicle attempting to exit the United States and enter Mexico. The driver was identified as Ramon ARELLANO-Ramos and the front passenger as Ada Selene CERECER-Castro. Officers referred this vehicle to secondary inspection where it was searched. In the rear passenger area officers discovered a cardboard box containing firearms and firearm components; specifically, five AR-style upper receivers, five AR-style lower receivers, five AR-style barrels, five AR-style buffer tubes, five trigger component kits, five AR-style pistol grips, and one Beretta 9mm pistol. During a post-Miranda statement, ARELLANO admitted that he was going to receive \$350 to smuggle a rifle into Mexico. He was to receive further instructions of where to deliver the firearm upon arrival in Mexico. During a post-Miranda statement, CERECER admitted that she and ARELLANO were going to receive \$1,000 to smuggle weapons into Mexico. They were to receive further instructions of where to deliver the firearms upon arrival in Mexico. CERECER further stated that this was her fifth time she and ARELLANO had smuggled weapons into Mexico. Neither ARELLANO nor CERECER had any license or other legal authority to export the firearms and firearms components into Mexico.	
MATERIAL WITNESS(ES) IN RELATION TO THE CHARGE: N/A	
<b>DETENTION REQUESTED</b> Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	<b>SIGNATURE OF COMPLAINANT</b> 
REVIEWED by AUSA Angela W. Woolridge 	<b>OFFICIAL TITLE</b> HSI Special Agent
Sworn to before me and subscribed in my presence.	
<b>SIGNATURE OF MAGISTRATE JUDGE<sup>1)</sup></b> 	<b>DATE</b> April 29, 2019

1) See Federal rules of Criminal Procedure Rules 3 and 54